

**HACH ROSE SCHIRIPA
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**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NEW YORK**

TIMOTHY TANSKI, on behalf of himself and
others similarly situated,

Plaintiffs,

-against-

AVALONBAY COMMUNITIES, INC.,

Defendant.

Civil No. 15-cv-06260(LDW)(AKT)

**NOTICE OF MOTION FOR AWARD OF ATTORNEYS' FEES AND COSTS
AND APPROVAL OF SERVICE AWARD**

For the reasons set forth in the Memorandum of Law in Support of Plaintiffs' Motion for Attorneys' Fees and Costs and Approval of Service Award, along with the supporting Declaration of Frank R. Schirripa, and the exhibits attached thereto, Plaintiffs' respectfully request that the Court enter an Order:

- (1) awarding Class Counsel attorneys' fees in the amount of \$99,833.33;
- (2) reimbursing Class Counsel's litigation costs in the amount of \$4,632.18; and
- (3) for services rendered on behalf of the Lawsuit and Class Members, Named Plaintiff Timothy Tanski shall be awarded \$5,000.00. This service awards is in addition to any settlement amount Plaintiff Tanski is eligible to receive pursuant to the Agreement as members of the Rule 23 Class and FLSA Collective.

An omnibus Proposed Order regarding (1) Plaintiffs' Motion for Final Approval (Dkt. No 93), and (2) Plaintiffs' Motion for Attorneys' Fees and Costs and Approval of a Service Award has been filed with the Court. (*See* Proposed Order, Dkt. No. 93-1).

Dated: New York, New York
July 24, 2019

Respectfully submitted,

HACH ROSE SCHIRIPA & CHEVERIE LLP

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